IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

DENISE TATUM, et al., Plaintiffs, vs.	Case No. 2:13-CV-01814-LPL (Filed Electronically)
NATIONAL FOOTBALL LEAGUE; NFL FILMS, INC.; and NFL PRODUCTIONS, LLC, Defendants.) DECLARATION OF DANIEL J. CONNOLLY IN SUPPORT OF DEFENDANTS' MOTION TO TRANSFER)

- 1. My name is Daniel J. Connolly. I am one of the attorneys representing Defendants National Football League; NFL Films, Inc.; and NFL Productions, LLC (collectively "Defendants"), in this action and submit this Declaration in support of Defendants' Motion to Transfer.
- 2. I also represent the same defendants in *Dryer v. National Football League*, No. 09-cv-2182-PAM-AJB (D. Minn.). I was present at a hearing in the *Dryer* case on February 28, 2014 before Special Master Arthur J. Boylan. At that hearing, the Special Master announced on the record that he had spoken to Judge Magnuson, who is presiding over the *Dryer* case, and that Judge Magnuson had informed him that due to the Court's schedule the trial date in *Dryer* would likely be postponed past the current June 1, 2014 trial ready date. The Special Master also informed the parties that certain discovery deadlines in *Dryer* would be pushed back.

I declare under penalty of perjury that the foregoing is true and correct. Executed on March 5, 2014.

s/ Daniel J. Connolly
Daniel J. Connolly